

City and County of San Francisco

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HUNTERS POINT
SSIC NO. 5090.3
Department of Public Health



July 21, 1994

Mr. Ray Ramos
Western Division
Naval Facilities Engineering Command, Code T4D1RR
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San Bruno, CA 94066-0720

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Remedial Project Manager, H-9-2
USEPA
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San Francisco, CA 94105

Mr. Cyrus Shabahari
Cal/EPA Department of Toxic Substances Control
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Berkeley, CA 94710-2737

San Francisco Department of Public Health Comments on the Parcel A Groundwater Investigations

Dear Mr. Ramos, Mr. Shabahari and Ms. Mangelsdorf:

The following comments are in response to several letters that have been written by the Navy and the agencies discussing the groundwater issues at Parcel A and as a follow-up to the meetings held on June 29 and July 13, 1994, between the Navy and the agencies.

General Comments:

As agreed on at the June 29 and July 13 meetings, the transfer of Parcels A1 and A2 to the city should proceed as planned. The groundwater issues that are still in dispute should not impact the transfer of these two Parcels.

We fully support the United States Environmental Protection Agency (USEPA) and the Department of Toxics Substances Control (DTSC) in their attempts to ensure that all steps necessary to protect human health and the environment have been taken. Although the City desires to have the property at Hunters Point transferred in a timely manner, we do not wish

this to happen at the expense of ensuring that all necessary investigations and cleanups have occurred. The SFRA (San Francisco Redevelopment Agency) has indicated that it will not accept title to any property until the agencies certify that all steps necessary to protect human health and the environment have been taken.

The SFRA currently views the Parcels at Hunters Point in two categories: 1) The upland Parcels A1 and A2 that will be transferred in late 1994 or early 1995 and 2) all other parcels to be transferred sometime in the future. Given these categories, there is no need for the Navy or the agencies to be concerned that the investigation in the lowlands of Parcel A will impact the transfer of the uplands parcels or vice versa. If the agencies feel that further groundwater investigations are required on the lowlands of Parcel A then these investigations should be performed.

Specific comments on the possibility of deed restrictions for Parcels A1 and A2

The Navy and the agencies have discussed the possibility of deed restrictions for groundwater use at Parcels A1 and A2. This matter needs to be discussed further between the Navy, the agencies and the City. On the basis of the current information about the fractured bedrock flow and the inability to determine the exact direction or the quantity of water in the bedrock aquifer, it is impossible to determine that all of the groundwater in Parcel A is unusable for drinking or irrigation. As the many tests have shown, there is incredible variability in the quantity and quality of groundwater in wells in the upland portion of Parcel A. There may be wells where the flow or contaminant levels make the groundwater unsuitable for drinking but these small areas can not be generalized to be the condition of the groundwater throughout Parcel A. Clear notification and identification in the transfer documents of where the groundwater has been found to be unsuitable for drinking is sufficient for meeting CERCLA requirements. We would propose that the City as the owner and user of Parcel A test the groundwater (according to ~~current~~ regulatory procedures) when a drinking water or irrigation well is proposed and determine at that time whether the groundwater is suitable for that use. If the property is transferred to a third party, the City and State have adequate authority over wells and groundwater to regulate future groundwater usage. We look forward to discussing this issue further with the agencies and the Navy.

Response to the Navy's proposal to install a diversion system for the seep on the lowlands of Parcel A

The proposal to install a diversion system for the seep in the lower parking lot adjacent to Building 101 does not appear to be a long term solution to the groundwater issues in the lowlands. If this diversion is being proposed as a remedial alternative to eliminate an exposure pathway then this system should be installed only after the City and the public have had an opportunity to review and comment on the proposal, as required for any long term

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remedial action. The SFRA in its redevelopment of the property should have the freedom to change the configuration of all existing structures, parking lots and underground utilities, including the sanitary sewer. The redevelopment should not be constrained by any structures except those installed as approved permanent long term remedial actions. Any systems that will effect the configuration of redevelopment will certainly effect the conditions on which the property is transferred.

As stated previously, this issue does not need to be resolved immediately because the area of concern is in the lowlands of Parcel A, an area that is not being transferred at this time. We would be happy to discuss this matter further and would like to be able to comment on the details of any engineered solutions that will affect long term development of the property.

If you have any questions or need further information about these comments, please contact me at (415) 554-2778.

Sincerely,



Amy Brownell, P.E.
Site Mitigation Engineer

cc: Richard Powell, WestDiv
Theresa McGarry, DTSC
Bill Lee, SFDPH
Bryon Rhett, SFRA
John Cooper, City Attorney